

To the Federal Communications Commission
In the matter of RM-10740

July 22, 2003

Petition for Rule Making RM-10740 proposes to limit the bandwidth of any amateur station using J3E, Single Sideband emission to 2.8 kHz and of any station using A3E, Double Sideband Amplitude Modulation emission to 5.6 kHz. These limits are unnecessary to begin with, they are poorly chosen, and they would be difficult to comply with and to enforce as well.

As the petitioners note, the Commission has already been able to cite section 97.307(a) of the Rules to reign in amateur stations transmitting excessively wide signals. The specific bandwidth limitations proposed are obviously not necessary for these citations to occur. While the proposed limitations may seem to some to be appropriate to the state-of-the-art as currently practiced, they will undoubtedly become outmoded with additional technological developments. The Commission and amateurs alike are much better served by the latitude afforded by the current Rules.

The 2.8 kHz absolute limit for J3E emission and of 5.6 kHz for A3E emission would render many, older but still perfectly serviceable transmitters illegal or non-functional. The very well respected and still quite serviceable Collins 32S-line of J3E Single Sideband transmitters, for example, were built with a 3.1 kHz bandwidth filter and would thus become illegal. With respect to Double Sideband Amplitude Modulation, the petition authors note that audio frequencies from 300 to 3000 Hz are necessary to provide "natural" speech, and yet they propose a 5.6 kHz limitation for A3E transmitters that would limit their audio range to frequencies less than 2800 Hz. Practically speaking, since most of the A3E type transmitters currently in use are "vintage" types and would have to be retrofitted with a high-pass audio filter as the petitioners point out, the roll-off frequency of that filter would have to be well below the 2800 Hz upper limit frequency in order to meet the proposed requirement of a 5.6 kHz absolute bandwidth limit. That would make the resulting DSBAM signal even worse.

Enforcement of the proposed regulations would require that the Commission become the Spectrum Analysis Police. For Signal Sideband signals, you would be required to decide just how much carrier and unwanted sideband suppression was enough, and then to measure that suppression and the total bandwidth that for each signal on the band. For DSBAM signals you would likewise be required to decide how much suppression of the sidebands above 2.8 kHz was enough and to measure the total bandwidth of the signals. I doubt that the Commission wants that job.

I understand that the petitioners would like to give the Commission the tools needed to remove the few, blatantly broad signals that are currently polluting the bands, but the proposed regulations are unnecessary overkill that would impose a considerable burden on many licensees who are not radiating overly wide signals. The regulations already in existence are quite sufficient. I urge you to reject this proposal.

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